

PATRICK D. ROBBINS (CABN 152288)
 Acting United States Attorney
 PAMELA T. JOHANN (CABN 145558)
 Chief, Civil Division
 KELSEY J. HELLAND (CABN 298888)
 Assistant United States Attorney
 U.S. ATTORNEY'S OFFICE
 450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102-3495
 (415) 436-7200

ERIC HAMILTON
 Deputy Assistant Attorney General
 DIANE KELLEHER
 Branch Director
 CHRISTOPHER HALL
 Assistant Branch Director
 JAMES D. TODD, JR.
 Senior Trial Counsel
 YURI S. FUCHS
 GREGORY CONNER
 Trial Attorneys
 U.S. DEPARTMENT OF JUSTICE
 Civil Division, Federal Programs Branch
 P.O. Box 883
 Washington, DC 20044

Counsel for Defendants

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
 GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
 MANAGEMENT, *et al.*,

Defendants.

) Case No. 3:25-cv-1780-WHA

) **DEFENDANTS' UNOPPOSED**
) **ADMINISTRATIVE MOTION FOR 3-HOUR**
) **EXTENSION AND INCREASED PAGE LIMITS**
) **RE: PRELIMINARY INJUNCTION BRIEFING**

) Honorable William H. Alsup

Pursuant to Civil Local Rules 6-1, 7-4(b), and 7-11, Defendants hereby move unopposed for (1) a three-hour extension to their deadline to file by noon today their oppositions to Plaintiff State of Washington's Motion for Preliminary Injunction and to Plaintiffs' Motion for Compliance, such that Defendants' oppositions would be due at 3pm PDT; and (2) a five-page increase in the page limit of Defendants' opposition to Washington's PI Motion, such that Defendants' brief could be up to 30 pages.

1. The Court ordered Defendants to respond to any PI motion brought by the State of Washington and to any PI compliance motion brought by Plaintiffs by March 31, 2025, at noon PDT. *See* Dkt. No. 152. Defendants have been diligently preparing their responses to Plaintiffs' motions since those motions were filed on March 26. *See* Dkt. Nos. 155, 156. Due to the need to coordinate with the two-dozen agency defendants, Defendants respectfully request three additional hours to submit their responses to Plaintiffs' motions, such that they would be due at 3pm PDT on March 31, 2025.

2. In preparing their opposition to Washington's PI Motion, Defendants have determined that they need an additional five pages beyond the 25-page limit set by Civil L.R. 7-4(b) to sufficiently brief the issues presented, such that the brief could be up to 30 pages in length. This Court's Local Civil Rules allow a party to file a brief in excess of the Court's page limitations if requested by administrative motion prior to the due date. *See* Civil L.R. 7-4(b), 7-11.

3. Defendants contacted Plaintiffs' counsel to obtain their position on the relief requested herein. *See* Declaration of Kelsey J. Helland ¶ 2. Plaintiffs' counsel responded that Plaintiffs do not object to the relief requested herein. *See id.* ¶¶ 3-4. Defendants indicated that they would inform the Court of Plaintiffs' position.

For good cause shown above, Defendants respectfully request that the Court grant a three-hour extension to today's filing deadlines and allow Defendants to file a brief in opposition to Washington's PI motion of up to 30 pages in length.

///

1 DATED: March 31, 2025

Respectfully submitted,

2 PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
3 PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
4

5 s/ Kelsey J. Helland
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
6 U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
7 San Francisco, California 94102-3495

8 ERIC HAMILTON
Deputy Assistant Attorney General

9 DIANE KELLEHER
Branch Director
10 CHRISTOPHER HALL
Assistant Branch Director
11

12 JAMES D. TODD, JR.
Senior Trial Counsel

13 YURI S. FUCHS
GREGORY CONNER
Trial Attorneys
14 U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
15 P.O. Box 883
Washington, DC 20044
16
17 *Counsel for Defendants*

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
(415) 436-7200
kelsey.helland@usdoj.gov

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director
JAMES D. TODD, JR.
Senior Trial Counsel
YURI S. FUCHS
GREGORY CONNER
Trial Attorneys
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044
yuri.s.fuchs@usdoj.gov

Counsel for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF KELSEY J.
HELLAND IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION FOR 3-HOUR EXTENSION
AND INCREASED PAGE LIMIT**

The Hon. William H. Alsup

1 I, Kelsey J. Helland, declare, pursuant to 28 U.S.C. § 1746 and Local Rule 7-3, as
2 follows:

3 1. I am a member in good standing of the State Bar of California and am admitted as
4 a federal attorney in this Court. I represent all of the Defendants in this action.

5 2. On March 31, 2025, my co-counsel James Todd emailed counsel for Plaintiffs
6 requesting Plaintiffs' position on Defendants' requests for (1) a three-hour extension of
7 Defendants' deadline to file oppositions to Plaintiff State of Washington's Motion for
8 Preliminary Injunction and Plaintiffs' Motion for Compliance with the Preliminary Injunction;
9 and (2) a six-page increase in the page limit for Defendants' opposition to Washington's PI
10 Motion.

11 3. Counsel for Plaintiffs Danielle Leonard responded indicting Plaintiffs had no
12 objection to the requested three-hour extension.

13 4. Counsel for Plaintiff State of Washington Cynthia Alexander also responded,
14 indicating that Washington did not object to the requested three-hour extension and did not
15 object to the request to increase the page limit, so long as Defendants would agree that any reply
16 brief by the State of Washington could be up to 21 pages. I responded that Defendants agreed to
17 such a request.

18 5. Following Defendants' communications with Plaintiffs' counsel, Defendants
19 determined that they only needed five additional pages, rather than six.

20
21 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
22 and correct.

23
24 Dated: March 31, 2025

25
26
27 /s/ Kelsey J. Helland
28 KELSEY J. HELLAND

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
(415) 436-7200

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director
JAMES D. TODD, JR.
Senior Trial Counsel
YURI S. FUCHS
GREGORY CONNER
Trial Attorneys
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044

Counsel for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

~~PROPOSED~~ **ORDER GRANTING
ADMINISTRATIVE MOTION FOR 3-
HOUR EXTENSION AND INCREASED
PAGE LIMITS RE: PRELIMINARY
INJUNCTION BRIEFING**

~~[PROPOSED]~~ ORDER

Good cause appearing, Defendants' Unopposed Administrative Motion for 3-Hour Extension and Increased Page Limits Re: Preliminary Injunction Briefing is hereby GRANTED. Defendants' oppositions to Plaintiff State of Washington's Motion for Preliminary Injunction and Plaintiffs' Motion for Compliance with Preliminary Injunction shall be due March 31, 2025, at **3:00 p.m. PDT**. Defendants may file a brief in opposition to Washington's Motion for Preliminary Injunction of up to 30 pages.

DATED: **March 31, 2025**



HON. WILLIAM H. ALSUP
United States District Judge